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June 24, 2013

BY ECF

Honorable Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Abraham Gur v. Ben's Luxury Car and Limousine Service, et al.*,
Civil Action No. 13-CV-3330 (PKC)(VVP)**

Your Honor:

This firm represents Defendants, Ben's Luxury Car and Limousine Service, Inc., Henry Zilberman, Abraham Mzouz, and Pinhas Gadi (collectively, the "Defendants"), in the above-referenced matter. We write, with the consent of Plaintiffs' counsel, to respectfully request an extension of time to answer or otherwise respond to Plaintiffs' complaint from July 3, 2013 to July 15, 2013. A copy of a stipulation containing Plaintiffs' counsel's consent is annexed hereto as Exhibit "A."

In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need the additional requested time to continue investigating the allegations in Plaintiffs' complaint. No previous request for an extension of time to answer has been made by Defendants, and such an extension would not affect any other dates.

Accordingly, Defendants respectfully request that their time to answer or otherwise respond to the complaint be extended to July 15, 2013.

Respectfully submitted,

/s/

Scott R. Matthews

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TO: Douglas H. Wigdor, Esq. (By ECF)
David E. Gottlieb, Esq.
85 Fifth Avenue, Fifth Floor
New York, New York 10003
Attorneys for Plaintiffs

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
ABRAHAM GUR and JORGE MALDNADO, on :
behalf of themselves and on behalf of all other :
similarly situated persons, :

Plaintiffs,

-against-

BEN'S LUXURY CAR AND LIMOUSINE
SERVICE, INC., HENRY ZILBERMAN,
ABRAHAM MAZOUZ, and PINHAS GADI,

Defendants.

Civil Action No. CV 13-3330

STIPULATION


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IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel that, there
having been no previous requests for extension of time, the time of Defendants, Ben's Luxury
Car and Limousine Service, Inc. Henry Zilberman, Abraham Mazouz, and Pinhas Gadi, to
appear and answer or otherwise respond to the Complaint filed by Plaintiffs herein be extended
from July 3, 2013 until July 15, 2013.

Dated: New York, New York
June 19, 2013

THOMPSON WIGDOR LLP

By: 
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Attorneys for Plaintiffs

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